

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

<p>LAURI VALJAKKA</p> <p style="text-align: center;"><i>Plaintiff,</i></p> <p>v.</p> <p>NETFLIX, INC.</p> <p style="text-align: center;"><i>Defendant</i></p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>Civil Action No. 22-cv-001490-JKP</p> <p>NOTICE OF MOTION TO QUASH</p>
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Third Party AiPi, LLC has moved to quash the untimely Subpoena served upon AiPi by Defendant Netflix, Inc. The Motion to Quash was filed on January 31, 2024 in the United States District Court for the Eastern District of Virginia, where AiPi is located.

As set forth in attached copy of the Motion to Quash, as filed, AiPi moved to quash because Netflix (i) untimely filed the Subpoena months after discovery closed; (ii) improperly served the subpoena by calling for a deposition five days before the service of the subpoena; (iii) improperly filled out the Proof of Service on the back of the subpoena; (iv) failed to cite the applicable Federal Rules of Civil Procedure; (v) failed to provide 30 days required under Federal Rule of Civil Procedure 34 for the production of Documents; and (vi) seeks information that imposes an undue burden on AiPi.

A copy of the Motion and exhibits are attached hereto.

Dated: January 31, 2024

Respectfully submitted  
s/ Joseph J. Zito  
 Joseph J. Zito  
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**CERTIFICATE OF SERVICE**

Pursuant to the Federal Rules of Civil Procedure, I hereby certify that all counsel of record who have appeared in this case are being served on this 31st day of January, 2024, with a copy of the foregoing via ECF filing.

/s/ Joseph J. Zito

Joseph J. Zito

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